



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 09-034

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated September 2008.]

2. Form, Style and Placement in Administrative Code

a. In the plain language analysis section of the rule analysis, the phrase “amend the current rules to” should be stricken from the first sentence. “Amend” and “create” are separate terms of art in the rule promulgation context and should be used in accordance with their technical meanings. Similarly, “proposed” should replace “amended” in the second sentence and “proposed rule” should replace “rule amendment” in the third sentence.

b. In s. A-E 8.08 (3), should “the section” be replaced with “a section of the board” in order to better conform to the definition in s. A-E 1.02 (3)?

4. Adequacy of References to Related Statutes, Rules and Forms

a. In the statutes interpreted section of the rule analysis, should the board refer to additional sections of ch. 443, Stats.?

b. The board also should describe s. 15.08 (5) (b), Stats., in the explanation of agency authority section of the rule analysis.